

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PGA TOUR, INC.,

Plaintiff,

v.

PUBLIC INVESTMENT FUND OF THE
KINGDOM OF SAUDI ARABIA and YASIR
OTHMAN AL-RUMAYYAN,

Defendants.

Misc. Case No. 22-mc-00302-LJL

[underlying action: *Jones, et al. v. PGA TOUR, Inc.*, Case No. 5:22-cv-04486-BLF, United States District Court for the Northern District of California]

Judge: Hon. Lewis J. Liman
Courtroom: 15C

**STIPULATION AND [PROPOSED] ORDER TO TRANSFER UNDER FEDERAL RULE
OF CIVIL PROCEDURE 45(F)**

WHEREAS, on September 22, 2022, the PGA Tour, Inc. (“the TOUR”), served deposition and document subpoenas (the “Subpoenas”) on the Public Investment Fund of the Kingdom of Saudi Arabia (“PIF”) and Yasir Othman Al-Rumayyan in connection with an action currently pending in the United States District Court for the Northern District of California, *Jones, et al. v. PGA Tour, Inc.*, No. 22-cv-04486-BLF (N.D. Cal. filed Aug. 3, 2022);

WHEREAS, the Subpoenas were issued from the Northern District of California, where the action is pending, in accordance with Rule 45(a)(2) of the Federal Rules of Civil Procedure;

WHEREAS, the place of compliance for the Subpoenas is New York City, which is within the jurisdiction of the United States District Court for the Southern District of New York;

WHEREAS, on October 28, 2022, the TOUR filed a Motion to Compel PIF and Mr. Al-Rumayyan’s Compliance with Document and Deposition Subpoenas in the Southern District of New York, in accordance with Rule 45(c) of the Federal Rules of Civil Procedure;

WHEREAS, PIF and Mr. Al-Rumayyan, the parties subject to the subpoena, consent to the transfer of the Motion to Compel to the Northern District of California, where the underlying

action is currently pending, in accordance with Rule 45(f) of the Federal Rules of Civil Procedure;

WHEREAS, the TOUR consents to the transfer of any motion to quash the Subpoenas filed by PIF and/or Mr. Al-Rumayyan to the Northern District of California, in accordance with Rule 45(f) of the Federal Rules of Civil Procedure;

WHEREAS, PIF and Mr. Al-Rumayyan reserve all rights and objections and specifically object as to lack of personal jurisdiction in either court; and

WHEREAS, the Tour agrees that PIF and Mr. Al-Rumayyan reserve all rights and objections and do not waive any rights and objections through this stipulation.

IT IS HEREBY STIPULATED by and between the Parties hereto, through their respective attorneys of record, that the above-captioned miscellaneous action be transferred to the United States District Court for the Northern District of California.

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Respectfully submitted,

KEKER, VAN NEST & PETERS LLP

Dated: November 4, 2022

By: /s/ Elliot R. Peters

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Dated: November 4, 2022

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Arabia and Yasir Othman Al-Rumayyan.*

ECF ATTESTATION


Pursuant to Paragraph 8.5 of the Electronic Case Filing Rules & Instructions, the filer of this document, Elliot Peters, attests that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

Dated: November 4, 2022

/s/ Elliot Peters
Elliot Peters

SO ORDERED.

Dated: November 4, 2022


Hon. Lewis J. Liman
United States District Court Judge